



**Table of Authorities**

9 U.S.C. § 9..... 1

9 U.S.C. § 10..... 1

Goldman Sachs Execution & Clearing, L.P. (“Goldman”) submits this Opposition to the Cross-Petition to Confirm Arbitration Award (“Cross-Petition”) filed by The Official Unsecured Creditors’ Committee of Bayou Group, LLC, et al. Section 9 of the Federal Arbitration Act (“FAA”) provides for the confirmation of an arbitration award “unless the award is vacated, modified, or corrected as prescribed in sections 10 and 11 of” the FAA. 9 U.S.C. § 9. Under Section 10(a)(4) of the FAA, the Court may make an order vacating an arbitration award “where the arbitrators exceeded their powers, or so imperfectly executed them that a mutual, final, and definite award upon the subject matter submitted was not made.” 9 U.S.C. § 10(a)(4). Goldman has filed a petition pursuant to Section 10(a)(4) to vacate the same arbitration award that is the subject of the Cross-Petition. Should this Court grant Goldman’s petition to vacate, as Goldman urges, the grounds for confirming the arbitration award under Section 9 would not be satisfied.

Accordingly, Goldman respectfully requests that this Court deny the Cross-Petition.

Respectfully submitted,

Dated: September 20, 2010

s/ Howard Schiffman  
Howard Schiffman  
Eric A. Bensky  
Schulte Roth & Zabel LLP  
1152 Fifteenth Street, NW, Suite 850  
Washington, DC 20005  
(202) 729-7470 (telephone)  
(202) 730-4520 (facsimile)  
howard.schiffman@srz.com  
eric.bensky@srz.com

Counsel for Goldman Sachs  
Execution & Clearing, L.P.  
(f/k/a Spear, Leeds & Kellogg, L.P.)